

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

KHADIJAH TRIBBLE,

Plaintiff,

v.

Civil Action No. 1:24-cv-12760

CURALEAF HOLDINGS, INC.,  
and MATTHEW DARIN

Defendants.

**DEFENDANT MATTHEW DARIN'S MOTION TO DISMISS FOR LACK OF  
PERSONAL JURISDICTION PURSUANT TO FED.R.CIV.P. 12(b)(2)**

Defendant Matthew Darin hereby moves to dismiss Plaintiff's Amended Complaint pursuant to Fed. R. Civ. P. 12(b)(2). Mr. Darin has no connection to the Commonwealth of Massachusetts: he lives and works in Florida and has never lived in Massachusetts, he does not conduct business in Massachusetts, and he did not knowingly take *any* action in Massachusetts in connection to any of the facts relating to Plaintiff's specific allegations. Under these circumstances and as described more fully in the accompanying memorandum of law, Mr. Darin respectfully requests that the Court dismiss Plaintiff's Complaint against him for lack of personal jurisdiction pursuant to Fed. R. Civ. P. 12(b)(2).

Respectfully submitted,

CURALEAF HOLDINGS, INC.,  
and MATTHEW DARIN

By their attorneys,

/s/ Keerthi Sugumaran

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Dated: February 28, 2025

**LOCAL RULE 7.1 – CERTIFICATION**

I hereby certify that Defendants' counsel has conferred in good faith with Plaintiff's counsel on the issues set forth in the foregoing motion prior to bringing this motion and was unable to reach a resolution.

/s/ Keerthi Sugumaran  
Jackson Lewis P.C.

**CERTIFICATE OF SERVICE**

This hereby certifies that on this 28<sup>th</sup> day of February, 2025, this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Keerthi Sugumaran  
Jackson Lewis P.C.